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Acting under Authority Conferred by 28 U.S.C. § 515

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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,)	CASE NO. 3:24-cr-00329 CRB
)	
Plaintiff,)	MOTION TO SEAL DOCUMENTS
)	
v.)	
)	
RUTHIA HE, A/K/A RUJIA HE, and DAVID)	UNDER SEAL
BRODY,)	
)	
Defendants.)	

The United States hereby moves the Court for an Order sealing this Motion, the concurrently-filed Indictment, the Arrest Warrants, the Sealing Order, and all other related documents in the above-captioned case until further Order of the Court. The United States further moves the Court to Order that each of the aforementioned documents remain sealed until execution of the arrest warrants.

The reason for this request is that disclosure of the existence of the Indictment or Arrest Warrants could compromise the safety of law enforcement agents in the execution of the Arrest Warrants. In addition, the requested sealing is reasonably necessary to protect against the potential destruction of evidence and to prevent the possible flight of the defendants.

FILED

Jun 12 2024

Mark B. Busby
CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO

1 The United States also requests that, notwithstanding any sealing order, the Clerk of Court be
2 required to give copies of the sealed documents to employees of the United States Attorney's Office
3 and/or Special Agents of the Drug Enforcement Administration and Homeland Security Investigations.
4 In addition, the United States requests that the United States Attorney's Office be permitted to serve
5 working copies on federally-deputized state and local law enforcement officers, and other government
6 and contract personnel acting under the supervision of such investigative or law enforcement officers, to
7 effectuate the Court's Orders.

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9 DATED: June 12, 2024

Respectfully submitted,

10 MATTHEW M. YELOVICH
11 Attorney for the United States
12 Acting under Authority Conferred
13 by 28 U.S.C. § 515

14 /s/
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